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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$24,000.00 IN U.S.  
CURRENCY,

15 Defendant.  
16

2:21-MC-00041-WBS-KJN

CONSENT JUDGMENT OF  
FORFEITURE

17 Pursuant to the Stipulation for Consent Judgment of Forfeiture, the Court finds:

18 1. On September 1, 2020, inspectors with the United States Postal Inspection Service  
19 (“USPIS”) seized Approximately \$24,000.00 in U.S. Currency (hereafter “defendant currency”) during a  
20 parcel interdiction at the Processing and Distribution Center located in West Sacramento, California.

21 2. USPIS commenced administrative forfeiture proceedings, sending direct written notice to  
22 all known potential claimants and publishing notice to all others. On or about November 23, 2020,  
23 USPIS received a claim from Bradley Hoderny (“Hoderny” or “claimant”) asserting an ownership  
24 interest in the defendant currency.

25 3. The United States represents that it could show at a forfeiture trial that on September 1,  
26 2020, USPIS conducted a parcel interdiction at the Processing and Distribution Center located at 3775  
27 Industrial Boulevard, West Sacramento, California. During the interdiction, law enforcement officials  
28

1 identified a parcel that bore markers consistent with parcels used for shipping contraband. The Priority  
2 Mail Express label parcel #EE-123436318-US was addressed to Brad H. ("Hoderny") at PO Box 419,  
3 Columbia, CA 95310, with the following return address: Tom Field ("Field") at 62 Broughton Rd.,  
4 Marblehead, MA 01945.

5 4. The United States represents that it could further show at a forfeiture trial that the parcel  
6 was presented to a drug detection dog, who positively alerted to the presence of the odor of narcotics.

7 5. The United States represents that it could further show at a forfeiture trial that  
8 September 11, 2020, law enforcement contacted the recipient, Brad Hoderny, and he gave consent to  
9 open the parcel. After obtaining consent from the sender, law enforcement opened the Priority Mail  
10 Express medium flat rate box and discovered two Priority Mail Express envelopes. Within each  
11 envelope was a manila envelope. Inside each manila envelope was a vacuum sealed bag containing  
12 bundles of cash wrapped in carbon paper. The various bundles of cash totaled \$24,000.00.

13 6. The United States could further show at a forfeiture trial that the defendant currency is  
14 forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

15 7. Without admitting the truth of the factual assertions contained above, claimant specifically  
16 denying the same, and for the purpose of reaching an amicable resolution and compromise of this matter,  
17 claimant agrees that an adequate factual basis exists to support forfeiture of the defendant currency.  
18 Hoderny acknowledged that he is the sole owner of the defendant currency, and that no other person or  
19 entity has any legitimate claim of interest therein. Should any person or entity institute any kind of claim  
20 or action against the government with regard to its forfeiture of the defendant currency, claimant shall  
21 hold harmless and indemnify the United States, as set forth below.

22 8. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, as this  
23 is the judicial district in which acts or omissions giving rise to the forfeiture occurred.

24 9. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in which  
25 the defendant currency was seized.

26 10. The parties herein desire to settle this matter pursuant to the terms of a duly executed  
27 Stipulation for Consent Judgment of Forfeiture.

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1 Based upon the above findings, and the files and records of the Court, it is hereby ORDERED  
2 AND ADJUDGED:

3 1. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by and  
4 between the parties.

5 2. Upon entry of this Consent Judgment of Forfeiture, \$13,500.00 of the Approximately  
6 \$24,000.00 in U.S. Currency, together with any interest that may have accrued on the total amount  
7 seized, shall be forfeited to the United States pursuant to 21 U.S.C. § 881(a)(6), to be disposed of  
8 according to law.

9 3. Upon entry of this Consent Judgment of Forfeiture, but no later than 60 days thereafter,  
10 \$10,500.00 of the Approximately \$24,000.00 in U.S. Currency shall be returned to claimant Bradley  
11 Hoderny through his attorney Isaac Safier.

12 4. The United States of America and its servants, agents, and employees and all other  
13 public entities, their servants, agents and employees, are released from any and all liability arising out  
14 of or in any way connected with the seizure or forfeiture of the defendant currency. This is a full and  
15 final release applying to all unknown and unanticipated injuries, and/or damages arising out of said  
16 seizure or forfeiture, as well as to those now known or disclosed. Claimant waived the provisions of  
17 California Civil Code § 1542.


18 5. No portion of the stipulated settlement, including statements or admissions made  
19 therein, shall be admissible in any criminal action pursuant to Rules 408 and 410(a)(4) of the Federal  
20 Rules of Evidence.

21 6. All parties will bear their own costs and attorney's fees.

22 7. Pursuant to the Stipulation for Consent Judgment of Forfeiture filed herein, the Court  
23 enters a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465, that there was reasonable cause  
24 for the seizure of the above-described defendant currency.

25 IT IS SO ORDERED.

26 Dated: January 21, 2022

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE